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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PHILIP GOLUBOWSKI, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

v.

ROBINHOOD MARKETS, INC., ET AL.,
Defendants.

CASE NO. 3:21-CV-09767-EMC

**STIPULATION RE FIRST AMENDED
COMPLAINT, MOTION TO
DISMISS, CASE MANAGEMENT
CONFERENCE AND [PROPOSED]
ORDER**

1 Plaintiffs Vinod Sohda and Amee Sohda (the “Sodhas” or “Lead Plaintiffs”) and Defendants
 2 Robinhood Markets, Inc. (“Robinhood”); Vladimir Tenev, Jason Warnick, Baiju Bhatt, Jan Hammer,
 3 Paula Loop, Jonathan Rubinstein, Scott Sandell, Robert Zoellick (together with Robinhood, the
 4 “Robinhood Defendants”); and Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, Barclays
 5 Capital Inc., Wells Fargo Securities, LLC, Mizuho Securities USA LLC, JMP Securities LLC, KeyBanc
 6 Capital Markets Inc., Piper Sandler & Co., Rosenblatt Securities Inc., BMO Capital Markets Corp.,
 7 BTIG, LLC, Santander Investment Securities Inc., Academy Securities, Inc., Loop Capital Markets
 8 LLC, Samuel A. Ramirez & Company, Inc., and Siebert Williams Shank & Co., LLC (the “Underwriter
 9 Defendants,” and together with the Robinhood Defendants, the “Defendants”) by and through their
 10 counsel of record jointly stipulate as follows:

11 WHEREAS, the December 22, 2021 initial case scheduling order (“Scheduling Order”) set an
 12 initial case management conference for March 22, 2022, and further established deadlines of 21 days
 13 before the conference for the parties to file ADR Certifications and to meet and confer regarding initial
 14 disclosures, early settlement, ADR process selection, and a discovery plan, *see* ECF No. 7;

15 WHEREAS, the Scheduling Order further provided that, if the initial case management
 16 conference is continued, then the relevant deadlines set forth therein would be continued for the same
 17 period of time;

18 WHEREAS, on March 1, 2022, the Parties stipulated that the initial case management
 19 conference and associated deadlines should be vacated in light of the then-pending motions to appoint
 20 lead plaintiff(s) and lead plaintiffs’ counsel;

21 WHEREAS, on March 9, 2022, the Court granted the Parties’ stipulation vacating the initial case
 22 management conference and ordered that the Parties submit a stipulation regarding the initial case
 23 management conference and associated deadlines within 10 days of the entry of the Court’s order
 24 appointing lead counsel;

25 WHEREAS, at the March 24, 2022, hearing on the motions to appoint the lead plaintiff(s) and
 26 plaintiffs’ counsel, the Court indicated that it would enter an order appointing the Sodhas as lead
 27 plaintiffs and the law firm of Scott + Scott as lead plaintiffs’ counsel;

1 WHEREAS, the newly appointed Lead Plaintiffs intend to amend their complaint;

2 WHEREAS, the Parties agree and stipulate that, in the interests of efficiency and in light of the
3 Private Securities Litigation Act's automatic stay on discovery during the pendency of a motion to
4 dismiss, 15 U.S.C. § 78u-4(b)(3)(B), the initial case management conference and associated deadlines
5 should be continued, to the extent necessary, until after the anticipated hearing on any motions to
6 dismiss and any order denying such motions to dismiss;

7 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

- 8 1. Lead Plaintiffs shall file their First Amended Complaint no later than June 10, 2022;
 - 9 2. Defendants shall file any motions to dismiss no later than August 8, 2022;
 - 10 3. Plaintiffs shall file any oppositions to any motions to dismiss no later than October 7,
11 2022;
 - 12 4. Defendants shall file any replies in support of any motions to dismiss no later than
13 November 7, 2022;
 - 14 5. Defendants shall notice a hearing for any motions to dismiss no sooner than December 8,
15 2022;
 - 16 6. The parties shall meet and confer regarding the rescheduling of an initial case
17 management conference (and the continuance of all ADR and other deadlines associated
18 therewith) should the Court deny Defendants' motion to dismiss.
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1 DATED: April 19, 2022

Respectfully submitted,

2 ANTONY L. RYAN
3 KEVIN J. ORSINI
4 BRITTANY L. SUKIENNIK
5 **CRAVATH, SWAINE & MOORE LLP**

6 MARK R. CONRAD
7 LIZ KIM
8 **CONRAD | METLITZKY | KANE LLP**

9 /s/ Mark R. Conrad
10 MARK R. CONRAD
11 Attorneys for Robinhood Defendants

12 JAMES N. KRAMER
13 ALEXANDER K. TALARIDES
14 **ORRICK HERRINGTON & SUTCLIFFE LLP**

15 /s/ Alexander K. Talarides
16 ALEXANDER K. TALARIDES

17 Attorneys for Underwriter Defendants

18 JOHN T. JASNOCH
19 HAL CUNNIGHAM
20 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**
21 /s/ John T. Jasnoch
22 JOHN T. JASNOCH

23 Attorneys for Plaintiffs Vinod Sohda and Amee
24 Sohda

25 **ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

26 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
27 document has been obtained from the signatories.

28 Dated: April 19, 2022

s/ Mark R. Conrad
MARK R. CONRAD

[PROPOSED] ORDER

Pursuant to stipulation, the Court sets the following deadlines and schedule:

1. Lead Plaintiffs shall file their First Amended Complaint no later than June 10, 2022;
2. Defendants shall file any motions to dismiss no later than August 8, 2022;
3. Plaintiffs shall file any oppositions to any motions to dismiss no later than October 7, 2022;
4. Defendants shall file any replies in support of any motions to dismiss no later than November 7, 2022;
5. Defendants shall notice a hearing for any motions to dismiss no sooner than December 8, 2022;
6. The parties shall meet and confer regarding the rescheduling of an initial case management conference (and the continuance of all ADR and other deadlines associated therewith) should the Court deny Defendants' motion to dismiss.

IT IS SO ORDERED.

Dated: April __, 2022

HONORABLE JUDGE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE